

EXHIBIT A

BARRETT & PAVLUK , LLC

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ATTORNEYS AT LAW

1200 EAGLE AVENUE, SUITE 204

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(732) 493-2800

ATTORNEYS FOR PLAINTIFF(S)

NADINE GARY

PLAINTIFF(S),

VS.

WALMART,

JOHN DOE 1-5 (fictitious), and

ABC CORP. 1-5 (fictitious)

DEFENDANT(S)

SUPERIOR COURT OF NEW JERSEY
MONMOUTH COUNTY
LAW DIVISION

Docket No.

COMPLAINT

Plaintiff, Nadine Gary, residing in the Borough of Keyport, County of Monmouth, State of New Jersey, by way of Complaint against the defendants, says:

FIRST COUNT

1. On or about April 13, 2018, the plaintiff, Nadine Gary, was lawfully on the or near the premises of the Walmart store located on Route 66 in the Township of Neptune, County of Monmouth, State of New Jersey. Plaintiff was caused to slip and fall in the store.

2. At all times relevant hereto, the defendant, Walmart, its agents, servants and/or employees, was the landlord, owner, operator and/or maintainer of the subject premises and/or the employer of the maintainer of the subject property.

3. At the same time and place aforesaid, the plaintiff was caused injury as a result of the negligence of the defendant, its agents, servants and/or employees, in creating and maintaining a dangerous and hazardous condition on their premises and common areas.

4. As a direct and proximate result of the negligence of the defendant, Walmart, by its agents, servants and/or employees in creating and maintaining a dangerous and hazardous condition, plaintiff sustained severe and painful temporary and permanent injuries, suffered and will continue to suffer great pain, was required and will in the future be required to seek medical attention for her injuries, have and will in the future be required to remain away from her lawful business and occupation.

WHEREFORE, plaintiff, Nadine Gary, demands Judgment against the defendant, Walmart, its agents, servants and/or employees, jointly and severally, for damages, interest, costs of suit and attorneys fees.

SECOND COUNT

1. Plaintiff, Nadine Gary, repeats each and every allegation contained in the First Count of the Complaint and makes the same a part hereof.

2. At all times relevant hereto, the defendant, John Doe 1-5, fictitious names, by its agents, servants and/or employees, was the owner or landlord of the premises or was responsible for the design, construction, management and/or maintenance and/or cleaning of the subject premises and common areas

3. At the same time and place aforesaid, the plaintiff was caused to slip and fall as a result of the negligence of the defendant, John Doe 1-5, fictitious names, its agents, servants and/or employees, in creating and maintaining a dangerous and hazardous condition on the subject premises and common areas.

4. As a direct and proximate result of the negligence of the defendant, John Doe 1-5, fictitious names, its agents, servants and/or employees, in creating and maintaining a dangerous and hazardous condition, plaintiff sustained severe and painful temporary and permanent injuries, suffered and will continue to suffer great pain, was required and will in the future be required to seek medical attention for his injuries.

WHEREFORE, plaintiff, Nadine Gary, demands Judgment against the defendant, John Doe 1-5, fictitious names, its agents, servants and/or employees, jointly and severally, for damages, interest, costs of suit and attorneys fees.

THIRD COUNT

1. Plaintiff, Nadine Gary, repeats each and every allegation contained in the First and Second Counts of the Complaint and makes the same a part hereof.

2. At all times relevant hereto, the defendant, ABC Corporation 1-5, fictitious names, by its agents, servants and/or employees, was the owner or landlord of the premises or was responsible for the design, construction, management and/or maintenance and/or cleaning of the subject premises and common areas.

3. At the same time and place aforesaid, the plaintiff was caused to slip and fall as a result of the negligence of the defendant, ABC Corporation 1-5, fictitious names, its agents, servants and/or employees, in creating and maintaining a dangerous and hazardous condition on the subject premises and common areas.

4. As a direct and proximate result of the negligence of the defendant, ABC Corporation 1-5, fictitious names, its agents, servants and/or employees, in creating and maintaining a dangerous and hazardous condition, plaintiff sustained severe and painful temporary and permanent injuries, suffered and will continue to suffer great pain, was required and will in the future be required to seek medical attention for his injuries.

WHEREFORE, plaintiff, Nadine Gary, demands Judgment against the defendant, ABC Corporation 1-5, fictitious names, its agents, servants and/or employees, jointly and severally, for damages, interest, costs of suit and attorneys fees.

JURY DEMAND

Plaintiffs demand a trial by jury as to all issues.

CERTIFICATION PURSUANT TO R. 4:5-1

The undersigned hereby certifies the accuracy of the following:

1. Court actions which are pending: None.
2. Pending or contemplated arbitration proceedings: None.
3. Pending Workers' Compensation proceedings: None.

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of Rule 4:25-4 the court is advised that **JUDSON B.**

BARRETT is hereby designated as trial counsel.

BARRETT & PAVLUK, LLC
Attorneys for Plaintiff(s)

By: _____

Judson B. Barrett

Dated: 3/12, 2020

Civil Case Information Statement

Case Details: MONMOUTH | Civil Part Docket# L-000931-20

Case Caption: GARY NADINE VS WALMART

Case Initiation Date: 03/13/2020

Attorney Name: JUDSON BERNARD BARRETT

Firm Name: BARRETT & PAVLUK, LLC

Address: 1200 EAGLE AVE STE 204

OCEAN NJ 077127631

Phone: 7324932800

Name of Party: PLAINTIFF : GARY, NADINE

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

03/13/2020

Dated

/s/ JUDSON BERNARD BARRETT

Signed

MONMOUTH COUNTY
SUPERIOR COURT
PO BOX 1269
FREEHOLD

NJ 07728

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 358-8700
COURT HOURS 8:30 AM - 4:30 PM

DATE: MARCH 13, 2020
RE: GARY NADINE VS WALMART
DOCKET: MON L -000931 20

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON OWEN C. MCCARTHY

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003
AT: (732) 358-8700.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: JUDSON B. BARRETT
BARRETT & PAVLUK, LLC
1200 EAGLE AVE STE 204
OCEAN NJ 07712-7631

ECOURTS